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5 Attorneys for Defendant Monique Burns

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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11  
12 UNITED STATES OF AMERICA,

No. CR 3-12-mj-70126 MEJ

13 Plaintiff,

14 v.

UNOPPOSED MOTION TO MODIFY  
RELEASE CONDITIONS;  
ORDER MODIFYING CONDITIONS OF  
RELEASE

15 MONIQUE BURNS,

16 Defendant.  
17 \_\_\_\_\_/

18 By and through counsel, defendant Monique Burns respectfully requests that her release  
19 conditions in this case be modified, as follows:  
20

- 21 1. The defendant is permitted to travel to Tucson, Arizona for a period of four days  
22 – October 19, 2012 through and including October 22, 2012.  
23 2. **All other conditions will remain in effect.**

24 The reason for this request for a modification of travel restrictions is that Ms. Burns  
25 would like to attend “family weekend,” which is held at her son’s college. Ms. Burns’ son is  
26 currently enrolled as a freshman at the University of Arizona in Tucson.  
27

1 Ms. Burns has rented a car for this trip – the make, model and license plate of the vehicle  
2 she will be using has been provided to Pretrial Services. While in Tucson, she will be staying at  
3 the Four Point Sheraton, located at 7060 South Tucson Blvd, Tucson, AZ 85756, phone number  
4 (520) 746-0271.  
5

6 Pretrial Services Officer Betty Kim has been contacted, and she has no opposition to this  
7 modification. In addition, United States Attorney Kevin Barry has been contacted, and he has no  
8 objection to the request, given the approval of Pretrial Services.

9 The undersigned, Camellia Baray, declares under penalty of perjury that the foregoing is  
10 true and correct to the best of her information and belief.  
11

12  
13 Dated: October 3, 2012

Respectfully submitted,

14 BONJOUR, THORMAN,  
15 BARAY & BILLINGSLEY,  
16

17 /S/  
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CAMELLIA BARAY  
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13 UNITED STATES OF AMERICA,

No. CR 3-12-mj-70126 MEJ

14 Plaintiff,

15 v.

~~—[PROPOSED]~~ ORDER MODIFYING  
CONDITIONS OF RELEASE

16 MONIQUE BURNS,

17 Defendant.  
18 \_\_\_\_\_/

19  
20 Based on the approval of the parties and good cause appearing therefore, it is  
21 ORDERED that the defendant's release conditions be modified as follows:  
22

23 1. The defendant be permitted to travel to Tucson, Arizona from October 19, 2012  
24 through and including October 22, 2012.

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26 ///

27  
28 Unopposed Motion to Modify Release Conditions  
And Proposed Order  
No. CR 3-12-mj-70126 MEJ

2. All other conditions will remain in effect.

Dated: October 3, 2012



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The Honorable Maria-Elena James  
United States Magistrate Judge